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December 12, 2019

VIA ECF

Honorable Nancy Joseph
United States Courthouse, Room 253
517 East Wisconsin Avenue
Milwaukee, WI 53202

Re: Crafton Moore v. State Farm Fire and Casualty Company
Eastern District of Wisconsin Case No 18-CV-00539

Dear Judge Joseph:

I am writing as a follow up to my call with your clerk this afternoon. I represent State Farm Fire & Casualty Company in this case. We are scheduled for a final pretrial on January 24, 2020 and trial beginning on February 3, 2020. One of my witnesses, Michael Quick, is out of the country from February 1, 2020 to February 15, 2020. Thus, I requested dates from Plaintiff's counsel to take his videotaped evidentiary deposition. After some discussion, we agreed to take the deposition on January 23, 2020 in my office. Plaintiff's counsel, however, was concerned about the fact that we would be taking the deposition so close to the pretrial, and requested that I formally seek permission from you to take the deposition. Thus, I am writing to respectfully request permission to take Mr. Quick's evidentiary deposition by videotape on January 23, 2020. I have enclosed a proposed order and will e-mail the same to your proposed order e-mail address.

If you would like to discuss the matter with counsel, please let me know and I can arrange a conference call with Mr. Cade. Thank you for your time and attention to this matter.

Very truly yours,



Mark D. Malloy

cc: Nathaniel Cade, Jr. (via ECF)